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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON THE DRAFT SAMPLING AND ANALYSIS
PLAN FOR THE REMEDIAL INVESTIGATION AT SITE 54 MCRD PARRIS ISLAND SC
5/13/2013
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

May 13, 2013

Commanding Officer
NAVFAC Southeast
ATTN: Mr. Dan Owens
PO Box 30
Ajax Street North, Bldg 135
Jacksonville, Florida 32212

and

Commanding General
NREAO
ATTN: Mr. Tim Harrington
PO Box 5028
Parris Island, SC 29905

RE: Comments to Site 54 Draft SAP RI
Marine Corp Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Owens and Mr. Harrington:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the above referenced document received March 26, 2013. The Department reviewed the document with respect to applicable sections of the South Carolina Hazardous Waste Management Regulations (SCHWMR). Based on this review the Department has the following comments. Please see the attached engineering, hydrogeology and risk assessment memoranda.

The Department's review is based on the information presented by MCRD to date; any information found to be contradictory may require further action. If you have any questions regarding this issue, please contact me at (803) 896-4218.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meredith Amick', followed by a long horizontal line extending to the right.

Meredith Amick, P.E., Environmental Engineer
Corrective Action Engineering Section
Division of Waste Management

cc:

Lila Llamas, EPA Region 4
Annie Gerry, Hydrogeology
Priscilla Wendt, SCDNR

Russell Berry, EQC Region 8, Beaufort
Peggy Churchill, TtNUS

Engineering Memo
Prepared by Meredith Amick
Marine Corp Recruit Depot (MCRD)
May 8, 2013

1. Please use the most up to date screening values when producing the report that is generated from the work described in this workplan.
2. Please ensure that detection limits are below screening values for all analytes in all media. If this is not possible for certain analytes please discuss in the uncertainties section of the report for this work.
3. The document is contradictory when discussing surface water samples. It is the Department's understanding based on a March 21, 2013 conference call that surface water samples will only be collected if water is present at low tide.
4. It is the Department's understanding based on a May 8, 2013 conference call that a deep well will be installed next to TW-3. Additionally TW-7/SB-7 will be moved between Building 615 and the vault, and a deep well will be installed near this location as well.
5. Page 36
Please note the Department does not consider USTs and OWSs as anthropogenic influence; however, the Department has agreed with the NPAO data set provided in the Site 14 SI Report.
6. Page 47
It is clear in the bulleted points that MCAS Background data set will be used to screen soil data and that both the MCAS Background data set as well as the NPAO Background data set will be used to screen sediment. However the text in the last paragraph on this page is unclear. Please clarify.
7. Page 51
For Decision Rule #4 please clarify that analytes will be screened to background values as well prior to selecting COPCs.



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

MEMORANDUM

TO: Meredith Amick, P.E., Environmental Engineering Associate
Department of Defense Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Kent Krieg, Risk Assessor
Department of Defense Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management *KMK*

DATE: May 8, 2013

RE: Draft Sampling and Analysis Plan for RI Site 54 and Building 615
Marine Corps Recruit Depot, Parris Island, South Carolina
March 2013

The above referenced document by TetraTech has been reviewed. The Department does not have any risk related comments. If you need any further information, feel free to contact me at (803) 896-4262.

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Catherine B. Templeton, Director

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MEMORANDUM

TO: Meredith Amick, P.E.
Department of Defense (DoD) Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Annie M. Gerry, Hydrogeologist 
Department of Defense (DoD) Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: May 13, 2013

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of Draft- Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) Remedial Investigation for Site 54 (Old Waste Water Treatment Plant) and Building 615 (Former Armory), Marine Corp Recruit Depot (MCRD), Parris Island, South Carolina, dated May 2013

The above referenced document has been reviewed with respect to the conditions of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4 in January 2005. Site 54 is a former waste water treatment plant that received industrial and domestic waste and includes a three-part concrete vault. The area behind Site 54 was the location of Building 615, which was a former armory. Possible CLP (Cleaner, Lubricant, and Protectant) and dry cleaning solvents were used to clean weapons. Chlorinated solvents were discovered during an investigation in 2012 at Outfall 555, which drains storm water from Site 54 and former Building 615. The purpose of this report is to obtain more samples in different media to determine the extent of contamination and to determine if there may be an unacceptable risk which will be completed in the Remedial Investigation (RI).

Based on review of this document, the following comment has been generated.

On Page 58, Section 14.7- Temporary Monitoring Well Installation, the text states that wells screens will be constructed with either a 5 or 10-foot screen based on subsurface lithology. The Department is requiring that 10-feet long screens are used in well installation.

Should you have any questions regarding this memo, please contact me via email at GerryAM@dhec.sc.gov or by phone at (803) 896-4018.

File #50492

